December 23, 2020

Via ECF

The Honorable Loretta A. Preska,
United States District Court for the Southern District of New York,
500 Pearl Street,
New York, NY 10007.

Re: Petersen Energía Inversora S.A.U., et al. v. Argentine Republic and YPF S.A., No. 15 Civ. 2739 (LAP) ("Petersen"); Eton Park Cap. Mgmt. et al. v. Argentine Republic and YPF S.A., No. 16 Civ. 8569 (LAP) ("Eton Park")

Dear Judge Preska:

We write on behalf of Defendants the Republic of Argentina and YPF S.A., and Burford Capital LLC ("Burford") in connection with the Court's November 24, 2020 Order (*Petersen* Dkt. 220; *Eton Park* Dkt. 159) requiring Defendants and Burford to "meet and confer on the scope of discovery as to Burford" and to "provide the Court with an update no later than December 23, 2020."

Since November 24, 2020, Defendants and Burford have met and conferred regarding the scope of searches intended to capture documents responsive to Defendants' outstanding requests. The parties are continuing to negotiate certain aspects of Burford's search for documents, such as search terms and other parameters.

In light of the continued discussions, Defendants and Burford propose to provide a further status report to the Court on these issues no later than January 8, 2020.

Respectfully,

/s/ Robert J. Giuffra, Jr.

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The Honorable Loretta A. Preska

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